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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS' REPLY TO
DEFENDANT META PLATFORMS, INC.'S
OPPOSITION TO MOTION TO AMEND
CASE MANAGEMENT SCHEDULE**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of the Reply to Defendant’s Opposition to the Motion to Amend the Case Management Schedule.

2. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto.

3. Attached as **Exhibit A** to this Declaration is a true and correct copy of excerpts of Meta’s Responses and Objections to Plaintiffs’ Second Set of Interrogatories, dated September 30, 2024.

4. Attached as **Exhibit B** to this Declaration is a true and correct copy of excerpts from Meta’s Objections and Responses to Plaintiffs’ Fourth Set of Requests for Production, dated September 30, 2024.

5. Attached as **Exhibit C** to this Declaration is a true and correct copy of excerpt from Meta’s Objections and Responses to Plaintiffs’ Corrected Second Set of Requests for Production, dated April 19, 2024.

6. Attached as **Exhibit D** to this Declaration is a true and correct copy of an excerpt of Meta’s Responses and Objections to Plaintiffs’ First Set of Interrogatories, dated February 23, 2024. Meta supplemented its responses and objections to these interrogatories on August 22, 2024, but did not respond to Interrogatory No. 4 as written and did not identify any agreements as defined in and requested by Interrogatory No 4. Plaintiffs do not attach Meta’s supplemental objections and responses here because Meta designated them Confidential and AEO under the Protective Order.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4th day of October 2024 in San Francisco, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt